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April 20, 2018

Hon. Judge John. G. Koeltl
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*, Civil Action
No. 18-CV-2185, Joint Motion to Stay Further Proceedings on Defendant's
Motion to Unseal

Dear Judge Koeltl,

Pursuant to Rule 7.1(d) of the Local Rules of this Court, Plaintiff Eastern Profit Corporation Limited ("Eastern Profit") and Defendant Strategic Vision US LLC ("Strategic Vision") (collectively "the Parties") hereby respectfully request the Court to stay further proceedings, including any response, on Defendant Strategic Vision's motion to unseal this action filed on April 3, 2018 ("Motion to Unseal") until April 27, 2018.

As grounds for the stay, the Parties state as follows:

The contract that gives rise to the subject matter of this action (the "Contract") contains a confidentiality clause prohibiting the Parties from disclosing to any third party the existence of the Contract, any work relating to the Contract, and the participants in formulating, supervising or executing the Contract's provisions. As a result, to meet its obligations under the Contract, Plaintiff filed this action under seal on March 12, 2018.

On April 3, 2018, Defendant filed a motion to unseal this action (the "Motion to Unseal"). Plaintiff's opposition to the motion would be due today, on April 20, 2018. After Defendant filed its Motion to Unseal, the Parties conferred and agreed to negotiate the terms of a stipulated protective order that will allow this action to be unsealed, but will require certain particular information to remain confidential. The Parties expect to have concluded negotiations over the terms of the stipulated protective order by April 27, 2018. Because Defendant's Motion to Unseal would be superseded and rendered moot by the stipulated

protective order, the Parties request that the Court stay any further proceedings on Defendant's Motion to Unseal until then.

Respectfully submitted this 20th day of April, 2018.

EASTERN PROFIT CORPORATION
LIMITED,

By its attorneys,



Peter A. Sullivan, Esq.
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vice application to be submitted*)
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Certificate of Service

I certify that this document will be served via U.S. mail and e-mail on counsel of record for Defendant on this 20th day of April, 2018.



Shrutih V. Ramlochan-Tewarie